

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE STATEMENT COVER SHEET FOR THE
PERIOD FEBRUARY 1, 2022 THROUGH FEBRUARY 28, 2022**

Debtor: LTL Management LLC (“ LTL ”)	Name of Applicant: King & Spalding LLP (“ K&S ”)
Case No.: 21-30589 (MBK)	Client: Special Counsel to LTL Management LLC
Chapter: 11	Case Filed: October 14, 2021 (the “ Petition Date ”)

**SECTION I
FEE SUMMARY**

<input checked="" type="checkbox"/> Monthly Fee Application No. 3	<input type="checkbox"/> Interim Fee Application	<input type="checkbox"/> Final Fee Application
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Summary of Amounts Requested for the Period February 1, 2022 through February 28, 2022 (the “**Third Statement Period**”).

Total Fees for the LTL Debtor:	\$118,749.00 ¹
Total Disbursements:	\$284.75
Total Fees Plus Disbursements:	\$ 119,033.75
Minus 20% Holdback of Fees	\$23,749.80
Amount Sought at this Time:	\$95,283.95

Summary of Amounts Requested for Previous Periods:

	FEES	EXPENSES
Total Previous Fee Requested:	\$874,796.55	\$18,075.17
Total Fees Allowed To Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	\$0.00	\$0.00
Total Holdback (If Applicable):	\$136,380.38	\$0.00
Total Received By Applicant:	\$545,521.52	\$18,075.17

¹ The total amount of fees and expenses incurred by K&S during the Third Statement Period for matters in which it is solely representing LTL or is representing LTL jointly with Johnson & Johnson is \$120,039.60. Of this amount, as set forth in this fee statement, K&S is seeking payment in the amount of \$118,749.00 in fees and \$284.75 in expenses from LTL. K&S’ fees for matters in which it is solely representing Johnson & Johnson are not reflected in this monthly fee statement.

**COMPENSATION BY PROFESSIONAL
FEBRUARY 1, 2022 THROUGH FEBRUARY 28, 2022**

The attorneys who rendered professional services in these chapter 11 cases Third Statement Period are:

NAME OF PROFESSIONAL PARTNERS AND COUNSEL:	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Bush, Matthew	2012	725.00	12.3	8,917.50
Fournier, Kristen	2002	832.00	84.5	70,304.00
Hoffmann, Timothy	2003	1,240.00	13.3	16,492.00
Hynes, Kevin	2013	731.00	4.0	2,924.00
Johnson, Paul	1984	850.00	0.4	340.00
Romano, Julia	2008	798.00	0.2	159.60
Total Partners and Counsel:			114.7	\$99,137.10

NAME OF PROFESSIONAL: ASSOCIATES:	YEAR ADMITTED [†]	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Baker, Britney	2018	888.00	15.3	13,586.40
Gascoine, Evan	2008	510.00	8.2	4,182.00
Price, Patrick	2014	867.00	2.3	1,994.10
Zumsteg, Amy	2008	710.00	1.1	781.00
Total Associates:			26.9	\$20,543.50

[†] *Not Yet Admitted

The paraprofessionals who rendered professional services in these chapter 11 cases during the Third Statement Period are:

NAME OF PARAPROFESSIONALS AND OTHER NON-LEGAL STAFF	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
-	-	-	-
Total Paraprofessionals & Other Non-Legal Staff:		0	\$0.00

The total fees for the Third Statement Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
TOTALS:			
Partners and Counsel:	\$864.32	114.7	\$99,137.10
Associates:	\$763.70	26.9	\$20,543.50
Paraprofessionals and Other Non-Legal Staff:	-	-	-
Blended Attorney Rate:	\$845.20		
Blended Rate for All Timekeepers:	\$845.20		
Total Fees Incurred:		141.6	\$119,680.60
Less Fees for Johnson & Johnson Only Representation:			(\$931.60)
Total LTL Debtor Fees:			\$118,749.00

**SECTION II
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR
SERVICES RENDERED BY KING & SPALDING LLP
FOR THE PERIOD FEBRUARY 1, 2022 THROUGH FEBRUARY 28, 2022**

TASK CODE	DESCRIPTION	HOURS	AMOUNT
L002	Case Administration	2.3	1,994.10
L004	Fee/Employment Applications	28.9	30,042.40
L006	Litigation Consulting	107.8	85,695.90
L008	Litigation - Work on Appeals	2.6	1,948.20
Totals:		141.60	\$119,680.60
Less Fees for Johnson & Johnson Only Representation:			(\$931.60)
Total Fees Requested:			\$118,749.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY KING & SPALDING LLP
FOR THE PERIOD FEBRUARY 1, 2022 THROUGH FEBRUARY 28, 2022**

DISBURSEMENTS	AMOUNTS
CVN Monthly Video Subscription	148.50
Filing Fee	10.50
Virtual Hearing Fees	200.00
Total:	\$359.00
Less Expenses for Johnson & Johnson Only Representation:	(\$74.25)
Total Requested:	\$284.75

**SECTION IV
CASE HISTORY**

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| (1) Date cases filed: | October 14, 2021 |
| (2) Chapter under which case commenced: | Chapter 11 |
| (3) Date of retention: | December 16, 2021 <i>nunc pro tunc</i> to October 14, 2021 [Dkt. 859] (the “Retention Order”) ² . |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Third Statement Period, King & Spalding LLP (“King & Spalding”) provided the following services to the Debtor including, but not limited to, the following:

Case Administration

- Discuss, draft, and file response to show cause order in underlying talc case in federal court.
- Draft bankruptcy status report for underlying talc case in federal court.

Litigation Counseling

- Discuss and draft automatic stay and preliminary injunction related status updates requested by state and federal courts.
- Update pending case lists and other materials for bankruptcy teams.
- Assist Jones Day with preparation of filings relating to hearing on motion to dismiss and preliminary injunction, including compilation and review of various evidence to be submitted at hearing and preparation of related memorandum and other materials.
- Assist with review of expert reports and participate in related conference calls and other communications in advance of motion to dismiss hearing.
- Prepare background materials and witness kits for direct and cross examination of witnesses at hearing on motion to dismiss.
- Attend motion to dismiss hearing and review order regarding the same.
- Address issues and other matters relating to talc-related litigation.

Fee Application Preparation

- Correspond with Jones Day to discuss monthly fee statement and billing guidelines.
- Prepare first monthly fee statement and related exhibits, including review and revise invoices for privilege and compliance with U.S. Trustee’s Guidelines.

² The Retention Order is attached hereto as Exhibit A.

Litigation – Work on Appeals (50% Johnson & Johnson Split)

- Address various strategic issues and other matters relating to appeals.
- Compile materials for appellate briefing.
- Communicate with counsel regarding various issues, including those relating to briefing and appellate strategy.

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.

(6) Final disposition of case and percentage of dividend paid to creditors Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: April 7, 2022

/s/ Kristen R. Fournier

Kristen R. Fournier